

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Salvatore Gitto and Phyllis Gitto,

Plaintiffs,

-against-

A.W. Chesterton Co., Inc., et al.,

Defendants.

07 cv 4771 (DC)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Andrew Sapon, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

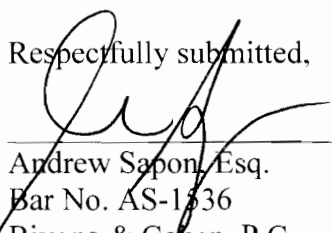
Applicant's Name: Raymond B. Biagini
Firm Name: McKenna Long & Aldridge LLP
Address: 1900 K Street, NW, Ste. 100
City/State/Zip: Washington, DC 20006
Phone Number: (202) 496-7687
Fax Number: (202) 496-7756

Raymond B. Biagini is a member in good standing of the Bar of the District of Columbia and the State of Pennsylvania. There are no pending disciplinary proceedings against Raymond B. Biagini in any State or Federal court.

Dated: July 17, 2007

City, State: New York, New York

Respectfully submitted,


Andrew Sapon, Esq.
Bar No. AS-1536
Bivona & Cohen, P.C.
Wall Street Plaza
88 Pine Street
(212) 363-3100 (Phone)
(212) 363-9824 (Fax)

DC:50488218.1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Salvatore Gitto and Phyllis Gitto,

Plaintiffs,

-against-

A.W. Chesterton Co., Inc., et al.,

Defendants.

07 cv 4771 (DC)

**AFFIDAVIT OF ANDREW SAPON IN
SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New York)
) ss:
County of New York)

Andrew Sapon, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Bivona & Cohen, P.C., counsel for Defendant Eaton Hydraulics Inc., formerly known as Vickers, Incorporated ("EHI"), in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts as set forth herein and in support of EHI's motion to admit Raymond B. Biagini as counsel pro hac vice to represent EHI in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1985. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Raymond B. Biagini since 2007.
4. Mr. Biagini is a partner at McKenna Long & Aldridge LLP in Washington, DC. and a member in good standing of the bars of the District of Columbia and State of Pennsylvania (see Certificates annexed hereto as Exhibit A).
5. I have found Mr. Biagini to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Raymond B. Biagini, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Raymond B. Biagini, pro hac vice, which is attached hereto as Exhibit B.

DC:50488217.1

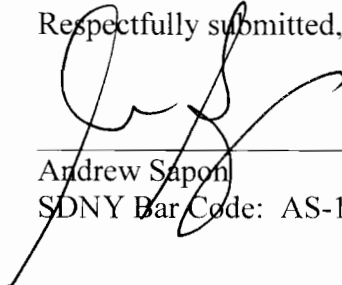
WHEREFORE it is respectfully requested that the motion to admit Raymond B. Biagini, pro hac vice, to represent EHI in the above captioned matter, be granted.

Dated: July 17, 2007

City, State: New York, New York

Notarized:

Respectfully submitted,



Andrew Sapon
SDNY Bar Code: AS-1536



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

Raymond B. Biagini

was on the 16th day of June, 1980,

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 18, 2007.

GARLAND PINKSTON, JR., CLERK

By: *Patricia A. Fay*
Deputy Clerk



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Raymond Brian Biagini, Esq.

DATE OF ADMISSION

November 19, 1979

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 19, 2007

A handwritten signature in cursive script, reading "Patricia A. Nicola".

Patricia A. Nicola
Chief Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Salvatore Gitto and Phyllis Gitto,

Plaintiffs,

-against-

A.W. Chesterton Co., Inc., et al.,

Defendants.

07 cv 4771 (DC)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Andrew Sapon, attorney for Defendant Eaton Hydraulics, Inc., formerly known as Vickers, Incorporated ("EHI"), and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Raymond B. Biagini
Firm Name: McKenna Long & Aldridge LLP
Address: 1900 K Street, NW, Ste. 100
City/State/Zip: Washington, DC 20006
Telephone: (202) 496-7687 Fax Number: (202) 496-7756
Email Address: rbiagini@mckennalong.com

is admitted to practice pro hac vice as counsel for EHI in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: July __, 2007
City, State: New York, New York

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SALVATORE GITTO)	
AND PHYLLIS GITTO,)	
)	
Plaintiffs,)	
)	Civil Action No. 07 cv 4771 (DC)
vs.)	
)	
A.W. CHESTERTON CO., INC.,)	
<i>et al.</i> ,)	
)	
Defendants.)	
_____)	

PROOF OF SERVICE

I am a citizen of the United States and employed by Bivona & Cohen, P.C. in New York County, New York. I am over the age of eighteen years and not a party to the above-referenced action. On July 18, 2007, I caused to be served on all counsel of record via first class mail, postage prepaid, a true and correct copy of the following documents:

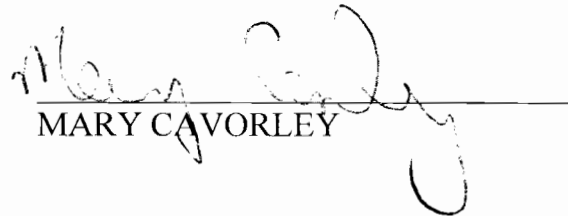
- 1) Motion to Admit Counsel (Raymond B. Biagini)
- 2) Affidavit of Andrew Sapon in Support of Motion to Admit in Support of Motion to Admit Counsel Pro Hac Vice. (Raymond B. Biagini)
- 3) Order for Admission Pro Hac Vice on Written Motion (Raymond B. Biagini)
- 4) Proof of Service (Raymond B. Biagini)

I further declare under penalty of perjury under the laws of the State of New York that the above is true and correct.

Executed on July 18, 2007 at New York, New York.

Dated: New York, New York
July 18, 2007

Respectfully submitted,



MARY CAVORLEY

TO:

SEE ANNEXED RIDER

SERVICE LIST

Jerome Block, Esq.
LEVY PHILLIPS & KONIGSBURG, L.L.P.
800 Third Avenue, 13th Floor
New York, New York 10022
Attorneys for Plaintiffs
Fax 212-605-6290

Julie Evans, Esq.
WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER, LLP
150 East 42nd Street
New York, New York 10017
*Attorneys for A.W. Chesterton, Co., Inc.,
Murphy Brother Works*
Fax 212-490-3038

Genevieve MacSteel, Esq.
MCGUIRE WOODS
1345 Avenue of the Americas, 7th Floor
New York, New York 10105
Attorneys for American Standard Inc. and the Trane Co.
Fax 212-548-2150

David M. Katzenstein, Esq.
MCGIVNEY & KLUGER, P.C.
80 Broad Street, 23rd Floor
New York, NY 10004
Attorneys for Aurora Pump Company
Fax 212-509-4420

Edward J. Wilbraham Esq
John S. Howarth, Esq.
WILBRAHAM, LAWLER & BUBA
1818 Market Street
Philadelphia, PA 19103
Attorneys for Buffalo Pumps, Inc.
Fax 215-564-4385

Frank A. Cecere, Esq.
AHMUTY DEMERS & McMANUS
200 I.U. Willets Road
Albertson, New York 11507
Attorneys for Carrier Corp.
Fax 516-294-5387

Michael Waller, Esq.
KIRKPATRICK & LOCKHART
PRESTON GATES ELLIS LLP
One Newark Center, Tenth Floor
Newark, NJ 07102
Attorneys for Crane Co. and Crane Pumps & Systems, Inc.
Fax 973-848-4001

Peter Lagenus, Esq.
SCHNADER, HARRISON, SEGAL & LEWIS
140 Broadway, Suite 3100
New York, New York 10005
*Attorneys for Dunham-Bush, Inc.,
n/k/a Fort Kent Moldings, Inc.*
Fax 212-972-8798

William Mueller, Esq.
CLEMENTE MUELLER & TOBIA, P.A.
P.O. Box 1296
Morristown, New Jersey 07962
Attorneys for Durabla Manufacturing Co.
Fax 973-455-8118

Donald Fay, Esq.
WATERS McPHERSON McNEIL
233 Broadway, Suite 970
New York, NY 10279
Attorneys for Elliot Turbomachinery Co.
Fax 212-227-6534

John A. Turlik, Esq.
SEGAL McCAMBRIDGE
SINGER & MAHONEY, LTD.
830 Third Avenue, Suite 400
New York, New York 10022
Attorneys for Fairbanks Morse Pumps
Fax 212-651-7499

Christopher Hannann, Esq..
KELLEY JASONS MCGOWAN
SPINELLI & HANNA, LLP
120 Wall Street, 30th Floor
New York, NY 10005
Attorneys for FMC Corporation
Fax 212-344-7402

Erich Gleber, Esq.
SEGAL McCAMBRIDGE
SINGER & MAHONEY, LTD
830 Third Avenue, Suite 400
New York, NY 10022
Attorneys for Flowerserve Corporation
Fax 212-651-7499

Michael A. Tanenbaum, Esq.
Diane Pompei, Esq.
SEDGWICK, DETERT,
MORAN & ARNOLD LLP
Three Gateway Center, 12th Floor
Newark, NJ 07102
Attorneys for Foster Wheeler Energy Corp,
Fax 973-242-8099

John A. Turlik, Esq.
SEGAL McCAMBRIDGE
SINGER & MAHONEY, LTD.
830 Third Avenue, Suite 400
New York, New York 10022
Attorneys for Garlock Sealing Technologies
Fax 212-651-7499

Diane Pompei, Esq.
SEDGWICK, DETERT,
MORAN & ARNOLD LLP
Three Gateway Center, 12th Floor
Newark, NJ 07102
Attorneys for General Electric Company
Fax 973-242-8099

Suzanne Halbardier, Esq.
BARRY McTIERNAN & MOORE
2 Rector Street, 14th Floor
New York, New York 10006
Attorneys for General Refractories
Fax 212-608-8901

John Fanning, Esq.
CULLEN & DYKMAN LLP
177 Montague Street
Brooklyn, New York 11201
Attorneys for Goulds Pumps Inc.,
Leslie Controls, Inc., Howden Buffalo, Inc.
Fax 718-935-1509

Jeff Kluger, Esq./ Joan Gaisor, Esq.
McGIVNEY & KLUGER, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004
Attorneys for Hercules Chemical Co, Inc.
Fax 212-509-4420

Jennifer Darger, Esq.
DARGER & ERRANTE, LLP
116 E.27th Street, 12th Floor
New York, NY 10016
Attorneys for Hopeman
Fax 212-452-5301

Lawrence G. Cetrulo, Esq./
Christopher A. D. Hunt, Esq.
CETRULO & CAPONE LLP
20 Exchange Place
New York, NY 10005
Attorneys for Howden Buffalo, Inc.
Fax 212-635-2239

Joseph Colao, Esq.
LEADER & BERKON
630 Third Avenue, 17th Floor
New York, New York 10017
Attorneys for IMO, and Warren Pumps, Inc.
Fax 212-486-3099

Lisa M. Pascarella, Esq.
PEHLIVAN, BRAATEN
& PASCARELLA, L.L.C.
Paytner's Ridge Office Park
2430 Route 34
Manasquan, NJ 08736
Attorneys for Ingersoll-Rand Company
Fax 732-528-4445

Lisa M. Pascarella, Esq.
PEHLIVAN, BRAATEN
& PASCARELLA, L.L.C.
115 Broadway, 19th Floor
New York, New York 10006
Attorneys for Ingersoll-Rand Company
732-528-4445

Robert C. Malaby, Esq.
MALABY, CARLISLE & BRADLEY, LLC
150 Broadway, Suite 600
New York, New York 10038
Attorneys for JH France Refractories Co.
Fax 212-791-0286

Mark S. Gaffrey, Esq.
HOAGLAND LONGO MORAN
DUNST & DOUKAS
40 Patterson Street
P.O. Box 480
New Brunswick, New Jersey 08903
Attorneys for Johnston Boilers Co.
Fax 732-545-4579

Timothy J. McHugh, Esq.
LAVIN, O'NEIL, RICCI,
CEDRONE & DISIPIO
420 Lexington Ave, Suite 2900
Graybar Building
New York, NY 10170
Attorneys for Otis Elevator Co.
Fax 212-319-6932

Arthur D. Bromberg, Esq.
WEINER LESNIAK, LLP
629 Parsippany Road
PO Box 0438
Parsippany, NJ 70754-0438
Attorneys for Peerless Industries, Inc.
Fax 973-403-0010

Stephen A. Manuele, Esq.
FELDMAN KIEFFER & HERMAN, LLP
The Dunn Building
110 Pearl Street, Suite 400
Buffalo, New York 14202
Attorneys for Quaker Chemical Corporation,
Selby Battersby & Company
Fax 716-852-4253

Linda Yassky, Esq.
SONNENSCHN NATH
& ROSENTHAL LLP
1221 Avenue of the Americas
23rd Floor
New York, New York 10020
Attorneys for Rapid-American Corp.
Fax 212-768-6800

Christopher Hannan, Esq.
KELLEY JASONS MCGOWAN
SPINELLI & HANNA, LLP
120 Wall Street, 30th Floor
New York, NY 10005
Attorneys for Sterling Fluid Systems
Fax 212-344-7402

Joan Gaisor, Esq.
McGIVNEY & KLUGER, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004
Attorneys for TACO, Inc.
Fax 212-509-4420

Philip J. O'Rourke, Esq.
McGIVNEY & KLUGER, P.C.
80 Broad Street, Suite 2300
New York, New York 10004
Attorneys for Tote Andale, Inc.
Fax 212-509-4420

Dave Weinberg, Esq.
SEGAL McCAMBRIDGE
SINGER & MAHONEY, LTD.
830 Third Avenue, Suite 400
New York, New York 10022
Attorneys for The Anchor Packing Co.
Fax 212-651-7499

Chuck McGivney, Esq.
McGIVNEY & KLUGER, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004
Attorneys for The Nash Engineering Co.
Fax 212-509-4420

Rob Tonogbanua, Esq.
DICKIE, MCCAMEY & CHILCOTE, P.C.
Public Ledger Building, Suite 901
150 South Independence Mall West
Philadelphia, PA 19106-3409
Attorneys for Tyco Flow Control Inc.
Fax 215-925-0307

Stephen S. Davie, Esq.
MACKENZIE HUGHES, LLP
101 South Salina Street
P.O. Box 4967
Syracuse, NY 13221-4967
Attorneys for Tyco Flow Control Inc.
Fax 315-233-8235

Judith Yavitz, Esq.
ANDERSON KILL & OLICK, P.C.
1251 Avenue of the Americas
New York, New York 10020
Attorneys for Union Carbide
Fax 212-278-1733

Norman Senior, Esq.
GREENFIELD STEIN & SENIOR
600 Third Avenue
New York, New York 10016
Attorneys for Uniroyal, Inc.
Fax 212-818-1264

William .&. Bradley, III, Esq.
MALABY, CARLISLE & BRADLEY, LLC
150 Broadway, Suite 600
New York, New York 10038
Attorneys for Viacom, Inc.
Fax 212-791-0286

Rob Tonogbanua, Esq.
DICKIE, MCCAMEY & CHILCOTE, P.C.
Public Ledger Building, Suite 901
150 South Independence Mall West
Philadelphia, PA 19106-3409
Attorneys for Yarway Corp
Fax 215-925-0307

Robert J. Kenney, Esq.
SEGAL McCAMBRIDGE
SINGER & MAHONEY, LTD.
830 Third Avenue, Suite 400
New York, New York 10022
Attorneys for Gardner Denver
Fax 212-651-7499

Diane Pompei, Esq.
SEGWICK, DETERT,
MORAN & ARNOLD LLP
Three Gateway Center, 12th Floor
Newark, NJ 07102
Attorneys for Gardner Denver
Fax 973-242-8099

Counsel Unknown for the following Defendants:
BLACKMER PUMP
GRISHAM RUSSELL
NORTMROP GRUMMAN SYSTEMS, CORP.
WALTER H. EAGAN CO, INC.
WEIL PUMP CO.